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11 SYSTEM/WEST, and FEATHER RIVER HOSPITAL
12 d/b/a ADVENTIST HEALTH FEATHER RIVER

13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 In re:
17 PG&E CORPORATION,
18 - and -
19 PACIFIC GAS AND ELECTRIC COMPANY
20 Debtors.

Case No. 19 - 30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**ADVENTIST CLAIMANTS' LIMITED
OBJECTION TO THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS'
MOTION TO ESTABLISH PROCEDURES
FOR DISCOVERY PRECEDING PLAN
CONFIRMATION [DOCKET NO. 5840]
AND RESERVATION OF RIGHTS**

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22
23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric
25 Company
26 ☒ Affects both Debtors

27 ** All papers shall be filed in the Lead Case,
28 No. 19-30088 (DM).*

Hearing Date and Time:

Date: March 10, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Courtroom 17

450 Golden Gate Ave., 16th Floor
San Francisco, CA 94102

1 Creditors Adventist Health System/West, a California religious non-profit corporation
2 (“Adventist Health”), and Feather River Hospital, a California religious non-profit corporation,
3 d/b/a Adventist Health Feather River (“AHFR” and, collectively with Adventist Health,
4 “Adventist”), hereby respectfully submit this limited objection to *The Official Committee of Tort*
5 *Claimants’ Motion to Establish Procedures for Discovery Preceding Plan Confirmation* (the
6 “Motion”) [Docket No. 5840] based on the following:

7 1. Adventist holds substantial prepetition claims against the estates related to the wildfires
8 caused by the Debtors.

9 2. It is unclear from the Motion whether the proposed discovery procedure is limited to
10 just those entities identified as “Vendors” in the Motion (as that term is defined in the Motion).
11 To the extent that the relief sought by the Motion is limited to discovery done of those “Vendors,”
12 then Adventist does not object to the Motion.

13 3. To the extent that the relief requested in the Motion is meant to govern any other
14 discovery proposed by the Official Committee of Tort Claimants (the “TCC”) related to
15 confirmation issues, then Adventist objects. Discovery related to confirmation issues not
16 specifically related to the Vendors should be governed by Federal Rule of Bankruptcy Procedure
17 9014, with the parties meeting and conferring over expedited response deadlines where needed.
18 Any order approving of the Motion should expressly state that it covers only discovery done of
19 the “Vendors” identified in the Motion and nothing else.

20 4. Adventist reserves the right to join in objections to the Motion filed by other parties,
21 and to raise and be heard on those objections at the hearing on the Motion.

22 Dated: March 3, 2020

Respectfully submitted:

23 REBECCA J. WINTHROP
24 NORTON ROSE FULBRIGHT US LLP

25 By: /s/ Rebecca J. Winthrop
26 REBECCA J. WINTHROP
27 Attorney for Creditors ADVENTIST
28 HEALTH SYSTEM/WEST, and FEATHER
HEALTH FEATHER RIVER